

The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

MYRIAM ZAYAS,

Plaintiff,

v.

ANNETTE MESSITT, JEFFREY
WHITNEY, AMBER WHITNEY, et al.,

Defendants.

NO. 2:20-cv-00747 JCC

DECLARATION OF JANELLE
SERRAO

Janelle Serrao hereby declares as follows:

1. I am over the age of 18 and am competent to testify about the matters stated herein.

I make this declaration based on my personal knowledge and the records in this case.

2. I am a Legal Assistant with the Washington State Attorney General's Office assigned to work with Assistant Attorney General David La Raus.

3. At the direction of AAG David La Raus, on August 11, 2020, I submitted a request for a copy of the audio file of the March 17, 2020 72-Hour Shelter Care Hearing in the case of *In Re Dependency of ACZ*, King County Superior Court Juvenile Division, Cause No. 20-7-00666-0 KNT.

1 4. On August 13, 2020, I received a copy of the audio file of the March 17, 2020 72-
 2 Hour Shelter Care Hearing in the case of *In Re Dependency of ACZ*, King County Superior
 3 Court Juvenile Division, Cause No. 20-7-00666-0 KNT. I did not do anything in an attempt to
 4 alter the substance of the file in any way after receiving the file from the Court Clerk's Office
 5 DJA Records Office – Seattle Copy Center.

6 5. ***Exhibit 1*** to this declaration is a true and correct copy of the forms I filled out
 7 and submitted on August 11, 2020 in order to obtain a copy of the of the March 17, 2020 72-
 8 Hour Shelter Care Hearing audio file.

9 6. ***Exhibit 2*** to this declaration is a true and correct copy of the August 13, 2020
 10 notice I received when the court delivered the March 17, 2020 72-Hour Shelter Care Hearing
 11 audio file.

12 7. ***Exhibit 3*** to this declaration is a true and correct copy of the March 17, 2020 72-
 13 Hour Shelter Care Hearing audio file that I received from the Court Clerk's Office DJA Records
 14 Office – Seattle Copy Center.

15
 16 I declare under penalty of perjury of law under the laws of the State of Washington that the
 17 foregoing is true and correct.
 18

19 EXECUTED in Renton, Washington on this 8th day of July 2021.

20
 21 
 22 _____
 23 JANELLE SERRAO
 24
 25
 26

EXHIBIT 1



King County

Department of Judicial Administration

Barbara Miner

Director and Superior Court Clerk

516 Third Avenue Room E609

(206) 296-9300 (206) 296-0100 TTY/TDD

Request for Copy (CD) of Digitally Recorded Hearing

DATE: 8/11/20

Clerk Initials _____

Customer's Name: JANELLE SERRAO – Attorney General's Office – SHS Seattle					
Customer's Phone Number: 206-389-3014					
Amount Paid: \$28			Receipt Number:		
Case Caption: Amiya Curnal-Zayas			Cause Number: 20-7-00666-0 KNT		
Date of Hearing	DR Number	Start Time	End time	*Format	
3/17/2020	1L	9:57:47	10:29:56	FTR (recommended) WAV	<input checked="" type="checkbox"/> <input type="checkbox"/>
				FTR (recommended) WAV	<input type="checkbox"/> <input type="checkbox"/>
				FTR (recommended) WAV	<input type="checkbox"/> <input type="checkbox"/>

*The default listening format is FTR ("For The Record") and requires the FTR Player. The free player will be provided on the CD for you. FTR format is also known as "transcription" format. If you are submitting your CD to a transcriber, be sure to request this format.

For listening on a personal listening device, such as a CD player, we can prepare your recording in .WAV format. **Be sure to clearly mark which format you are requesting** on the CD Request Form.


DATE PICKED UP: Please return audio via email to Janelle.serrao@atg.wa.gov

SIGNATURE: _____

To request additional copies of hearings use back of form.

- Complete the information required in its entirety and return this form to the Copy Center.
- The required information is available on the court minutes of the hearing you wish to have copied. If you do not provide this information a \$30.00 research fee may be required.
- FEES: \$25.00 per CD (Holds approximately 73 minutes) per RCW 36.18.016(12)
\$ 3.00 postage to mail your CD (upon request only) - **OR**
Self addressed stamped envelope appropriate for mailing CD's.
*enter your address on the back of the form

Mail in requests are also accepted. You may mail your request to either the Regional Justice Center or the King County Courthouse location. Requests for Juvenile recordings should be mailed to the Court Clerk's Office at Juvenile Court. (See addresses below).

FORM A19-1A Rev 4/2019	 STATE OF WASHINGTON INVOICE VOUCHER
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AGENCY USE ONLY			
AGENCY NO.	LOCATION / FILING CODE	AGENCY P.R./AUTH #	USE TAX
1000		RCW3926125	

AGENCY NAME	
VENDOR OR CLAIMANT (Warrant is to be payable to)	
King County Clerk 516 3rd Ave Room E609 Seattle, WA 98104-2363 Account No DJA080	

INSTRUCTIONS TO VENDOR: Submit this form to claim payment for materials, merchandise, or services. Show complete detail for each item.

VENDOR'S CERTIFICATE: I hereby certify under penalty of perjury that the items and totals listed herein are proper charges for materials, merchandise, or services furnished to the State of Washington, and that all goods furnished and/or services rendered have been provided without discrimination because of age, sex, marital status, race, creed, color, national origin, handicap, religion, or Vietnam era or disabled veterans status.

By _____

(SIGN IN INK)

PAYMENT TYPE	E	(TITLE)	(DATE)
VENDOR NO (FED ID, SOC SEC, or SWV #)	OMWBE Code	RECEIVED BY	DATE RECEIVED
SWV0000320-04			

DATE	DESCRIPTION	QUANTITY	UNIT	UNIT PRICE	AMOUNT	FOR AGENCY USE
05/05/20	Audio Recording for 3/17/20 Hearing	1	1	28.00	28.00	
	(72-hr Shelter Care Hearing)				-	
					-	
					-	
					-	
					-	
					-	
					-	
					-	
					-	

DIVISION USE	Vendor Selected by: AGO	<input checked="" type="checkbox"/>	Other		TOTAL	28.00
	Div Code: SHS	Matter Number 10878663		Case or Docket No: 20-7-00666-0 KNT		
	Case Name: Amiya Curnal-Zayas	Client Agency Code (3-digit): 307		Allocation Code (4-digit): 1100		

Prepared by:	Phone Number	Agency Approval - Print Name	Signature	Date
Janelle Serrao	206-389-3014	Mary F. Li		

Current Document No	Reference Document No	Account Number	Vendor Message
		DJA080	

Trans Code	Master Index	Sub	Sub	GL	MG	MS	Alloc Code	Budget Unit	Project	Amount	Invoice Date	Invoice Number
Program Index	Fund	Obj	Sub Object									

Accounting approval for payment	Date	Warrant Total	Warrant Number

EXHIBIT 2

From: [La Raus, David W \(ATG\)](#)
To: [Lenihan, Brendan \(ATG\)](#)
Subject: FW: 20-7-00666-0 KNT AMIYA CURNAL-ZAYAS
Date: Wednesday, June 30, 2021 2:32:33 PM

Email from my legal asst confirming receipt from court of the 3/17/20 audio files.

David La Raus
Assistant Attorney General
Division of Social & Health Services, Seattle
800 5th Ave. Ste. #2000
Seattle, WA 98164
(206) 464-7470
fax (206) 464-6338

NOTE: THIS EMAIL TRANSMISSION IS INTENDED ONLY FOR THE ADDRESSEE SHOWN ABOVE. IT MAY CONTAIN PRIVILEGED
ATTORNEY-CLIENT COMMUNICATION OR ATTORNEY WORK PRODUCT, OR OTHER INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL,
OR OTHERWISE PROTECTED FROM DISCLOSURE. ANY REVIEW, DISSEMINATION, OR USE OF THIS TRANSMISSION OR ITS CONTENTS
BY PERSONS OTHER THAN THE ADDRESSEE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR,
PLEASE DESTROY AND NOTIFY SENDER IMMEDIATELY BY EMAIL OR TELEPHONE AT THE ABOVE NUMBER. THANK YOU.

From: Serrao, Janelle S. (ATG)
Sent: Thursday, August 13, 2020 1:13 PM
To: Lighthill, Rachel T. (ATG) <Rachel.Lighthill@atg.wa.gov>; La Raus, David W (ATG) <david.laraus@atg.wa.gov>
Subject: RE: 20-7-00666-0 KNT AMIYA CURNAL-ZAYAS

I downloaded the zip audio files and saved them here:

[\\ATG.WA.LCL\ATG\DIV\SHS\ACTIVE\Cases\Cases_Juvie2020\CurnalZayas,Amiya_07062035\Audio72\20-7-00666-0](#)

I was able to listen to them, but I also have the FTR downloaded on my computer.

Please see if you are able to pull these audio files up.

If you're not able to, you may want to download the For The Record (FTR) onto your computer, which is the second option on the downloads at the link the court sent. If you have problems, ISD can help you out. I would call them since emailing them can be a couple day wait time.

From: Lighthill, Rachel T. (ATG)
Sent: Thursday, August 13, 2020 12:36 PM
To: La Raus, David W (ATG) <david.laraus@atg.wa.gov>; Serrao, Janelle S. (ATG) <janelle.serrao@atg.wa.gov>
Subject: RE: 20-7-00666-0 KNT AMIYA CURNAL-ZAYAS

Yea, I think digital audio would be better. Then hopefully I can upload into the court's ShareFile folder and they can pull from there.

From: La Raus, David W (ATG)
Sent: Thursday, August 13, 2020 12:19 PM
To: Serrao, Janelle S. (ATG) <janelle.serrao@atg.wa.gov>
Cc: Lighthill, Rachel T. (ATG) <Rachel.Lighthill@atg.wa.gov>
Subject: RE: 20-7-00666-0 KNT AMIYA CURNAL-ZAYAS

Can we put them in a computer file that can be emailed to parties, instead of a CD? Would that be easier? I seem to

recall some issue being able to hear those recordings though . . . ?

From: Serrao, Janelle S. (ATG)
Sent: Thursday, August 13, 2020 11:10 AM
To: La Raus, David W (ATG) <david.laraus@atg.wa.gov>
Cc: Lighthill, Rachel T. (ATG) <Rachel.Lighthill@atg.wa.gov>
Subject: FW: 20-7-00666-0 KNT AMIIYA CURNAL-ZAYAS

Hello,

We got the Audio back for the 72-hr Hearing.

Do you want me to have GS put these on CDs still?

And if so, where do you want the CDs to go; and if not, what would you like to see?

From: mail@sf-notifications.com <mail@sf-notifications.com>
Sent: Thursday, August 13, 2020 10:37 AM
To: Serrao, Janelle S. (ATG) <janelle.serrao@atg.wa.gov>
Subject: 20-7-00666-0 KNT AMIIYA CURNAL-ZAYAS



Seattle-Copy Center Station 1 has sent you files.

Expires 9/12/20

A note from Seattle-Copy Center :
Hello,

Please be aware that these files will automatically purge from ShareFile in 30 days. Once purged, you will need to submit and pay for a new reproduction of the audio if you require a re-send.

Please visit <https://app.fortherecord.com> should you experience any technical issues with the player provided, or to use the web-based player.

If you have any questions, please contact Records Access at 206-477-0846 or dja.copycenter@kingcounty.gov.

Thank you,
B. Kubasu
Deputy Clerk
DJA Records Access

[Download](#)

Trouble with the above link? You can copy and paste the following URL into your web browser:
<https://kcdja.sharefile.com/d-b28646cd526d4383>

ShareFile is a tool for sending, receiving, and organizing your business files online. It can be used as a password-protected area for sharing information with clients and partners, and it's an easy way to send files that are too large to e-mail.

EXHIBIT 3

The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

MYRIAM ZAYAS,

Plaintiff,

v.

ANNETTE MESSITT, JEFFREY
WHITNEY, AMBER WHITNEY

Defendants.

NO. 2:20-cv-00747 JCC

NOTICE OF PHYSICAL FILING

The attached thumb drive contains an audio file, which should be inserted here.